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**From:** Wetherington, Michele [Wetherington.Michele@epa.gov]  
**Sent:** 10/1/2020 3:41:56 PM  
**To:** Cooper, Jamal [cooper.jamal@epa.gov]; Gordon, Lisa Perras [Gordon.Lisa-Perras@epa.gov]  
**Subject:** RE: Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

Ok so leave this as is, save changes:

- i. GAEPD indicated that the revision adding the phrases "unreasonably" and "designated use of the water body" are a clarification only and not a substantive change in their historical application of the narrative standards; therefore the minimum requirements under 40 C.F.R. 131.6 are not necessary.
  1. For the phrase "unreasonably," EPA would rely on GAEPD's characterization rather than review the revisions under the regulations. EPA would not rely on GAEPD's submission and supplemental memorandum regarding the state court case as justification.

Reject ALL changes to lit risk made.

Thanks,

Michele

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**From:** Cooper, Jamal <cooper.jamal@epa.gov>  
**Sent:** Thursday, October 1, 2020 11:26 AM  
**To:** Gordon, Lisa Perras <Gordon.Lisa-Perras@epa.gov>; Wetherington, Michele <Wetherington.Michele@epa.gov>  
**Subject:** RE: Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

I will leave as is. The changes can be saved.

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**From:** Gordon, Lisa Perras <Gordon.Lisa-Perras@epa.gov>  
**Sent:** Thursday, October 1, 2020 11:24 AM  
**To:** Wetherington, Michele <Wetherington.Michele@epa.gov>; Cooper, Jamal <cooper.jamal@epa.gov>  
**Subject:** RE: Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

Follow-up: Would you recommend that T/S edits to litigation risk be not accepted?

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**From:** Wetherington, Michele <Wetherington.Michele@epa.gov>  
**Sent:** Thursday, October 1, 2020 11:18 AM  
**To:** Gordon, Lisa Perras <Gordon.Lisa-Perras@epa.gov>; Cooper, Jamal <cooper.jamal@epa.gov>  
**Subject:** RE: Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

I vote leave as is, but don't feel strongly so Jamal, delete the DU phrase if you want to.

Lit risk: Stacey/Tony deleted phrases. To accept those deletions, I made the accompanying additions. None of the edits needed to be made. It can remain as it was for Mary Walker's briefing.

Thanks,

Michele

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**From:** Gordon, Lisa Perras <Gordon.Lisa-Perras@epa.gov>  
**Sent:** Thursday, October 1, 2020 11:09 AM

**To:** Wetherington, Michele <[Wetherington.Michele@epa.gov](mailto:Wetherington.Michele@epa.gov)>; Cooper, Jamal <[cooper.jamal@epa.gov](mailto:cooper.jamal@epa.gov)>

**Subject:** RE: Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

I leave that section up to you two – if its accurate, we should recommend leaving it. In my opinion, MW will not be phased by that change, as it's not her focus.

Michele, as noted, JG wants to know if Leif agrees with the changes to litigation risk and if he thinks they should be made. She also said that litigation risk was one of our strongest arguments – so she wanted it to be strong. Thoughts?

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**From:** Wetherington, Michele <[Wetherington.Michele@epa.gov](mailto:Wetherington.Michele@epa.gov)>

**Sent:** Thursday, October 1, 2020 10:51 AM

**To:** Cooper, Jamal <[cooper.jamal@epa.gov](mailto:cooper.jamal@epa.gov)>; Gordon, Lisa Perras <[Gordon.Lisa-Perras@epa.gov](mailto:Gordon.Lisa-Perras@epa.gov)>

**Subject:** FW: Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

Should we just leave 2 ii as is now? Stacey is talking about deleting the DU phrase at the top of it but it is accurate as is right now.

Michele

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**From:** Bouma, Stacey <[Bouma.Stacey@epa.gov](mailto:Bouma.Stacey@epa.gov)>

**Sent:** Thursday, October 1, 2020 9:55 AM

**To:** Cooper, Jamal <[cooper.jamal@epa.gov](mailto:cooper.jamal@epa.gov)>; Gordon, Lisa Perras <[Gordon.Lisa-Perras@epa.gov](mailto:Gordon.Lisa-Perras@epa.gov)>; Wetherington, Michele <[Wetherington.Michele@epa.gov](mailto:Wetherington.Michele@epa.gov)>; Able, Tony <[Able.Tony@epa.gov](mailto:Able.Tony@epa.gov)>

**Subject:** Bouma, Stacey shared "GA Narrative RA Brief-09102020-edits10012020" with you.

Here was the latest version of the tracked changes discussed with Jeaneanne this morning. Can you make the changes as discussed, including the simplification of option 2 ii as Michele had suggested yesterday. If you can draft a summary email for JMG to send to Mary related to these changes that would be great too